

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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U.S. DISTRICT COURT
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MALIBU MEDIA, LLC,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP address
69.119.98.182,

Defendant.

: Civil Action No. _____

: **COMPLAINT – ACTION FOR**
DAMAGES FOR PROPERTY
RIGHTS INFRINGEMENT

: 14 CV 10179

X JUDGE SEIBEL

Plaintiff, Malibu Media, LLC, sues Defendant John Doe subscriber assigned IP address 69.119.98.182, and alleges:

Introduction

1. This matter arises under the United States Copyright Act of 1976, as amended, 17 U.S.C. §§ 101 et seq. (the “Copyright Act”).

2. Defendant is a persistent online infringer of Plaintiff’s copyrights. Indeed, Defendant’s IP address as set forth on Exhibit A was used to illegally distribute each of the copyrighted movies set forth on Exhibit B.

3. Plaintiff is the registered owner of the copyrights set forth on Exhibit B (the “Copyrights-in-Suit”).

Jurisdiction And Venue

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (patents, copyrights, trademarks and unfair competition).

5. Plaintiff used proven IP address geolocation technology which has consistently worked in similar cases to ensure that the Defendant's acts of copyright infringement occurred using an Internet Protocol address ("IP address") traced to a physical address located within this District, and therefore this Court has personal jurisdiction over the Defendant because (i) Defendant committed the tortious conduct alleged in this Complaint in this State, and (ii) Defendant resides in this State and/or (iii) Defendant has engaged in substantial and not isolated business activity in this State.

6. Based upon experience filing over 1,000 cases the geolocation technology used by Plaintiff has proven to be accurate to the District level in over 99% of the cases.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1331(b) and (c), because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this State; additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because Defendant or Defendant's agent resides or may be found in this District.

Parties

8. Plaintiff, Malibu Media, LLC, (d/b/a "X-Art.com") is a limited liability company organized and existing under the laws of the State of California and has its principal place of business located at 409 W. Olympic Blvd., Suite 501, Los Angeles, CA, 90015.

9. Plaintiff only knows Defendant by his, her or its IP Address. Defendant's IP address is set forth on Exhibit A.

10. Defendant's Internet Service Provider can identify the Defendant.

Factual Background

I. Defendant Used the BitTorrent File Distribution Network To Infringe Plaintiff's Copyrights

11. The BitTorrent file distribution network (“BitTorrent”) is one of the most common peer-to-peer file sharing systems used for distributing large amounts of data, including, but not limited to, digital movie files.

12. BitTorrent’s popularity stems from the ability of users to directly interact with each other in order to distribute a large file without creating a heavy load on any individual source computer and/or network. The methodology of BitTorrent allows users to interact directly with each other, thus avoiding the need for intermediary host websites which are subject to DMCA take down notices and potential regulatory enforcement actions.

13. In order to distribute a large file, the BitTorrent protocol breaks a file into many small pieces called bits. Users then exchange these small bits among each other instead of attempting to distribute a much larger digital file.

14. After the infringer receives all of the bits of a digital media file, the infringer’s BitTorrent client software reassembles the bits so that the file may be opened and utilized.

15. Each bit of a BitTorrent file is assigned a unique cryptographic hash value.

16. The cryptographic hash value of the bit (“bit hash”) acts as that bit’s unique digital fingerprint. Every digital file has one single possible cryptographic hash value correlating to it. The BitTorrent protocol utilizes cryptographic hash values to ensure each bit is properly routed amongst BitTorrent users as they engage in file sharing.

17. The entirety of the digital media file also has a unique cryptographic hash value (“file hash”), which acts as a digital fingerprint identifying the digital media file (e.g. a movie). Once infringers complete downloading all bits which comprise a digital media file, the

BitTorrent software uses the file hash to determine that the file is complete and accurate.

18. Plaintiff's investigator, IPP International UG, established a direct TCP/IP connection with the Defendant's IP address as set forth on Exhibit A.

19. IPP International UG downloaded from Defendant one or more bits of each of the digital movie files identified by the file hashes on Exhibit A.

20. Defendant downloaded, copied, and distributed a complete copy of Plaintiff's movies without authorization as enumerated on Exhibit A.

21. Each of the cryptographic file hashes as set forth on Exhibit A correlates to a copyrighted movie owned by Plaintiff as identified on Exhibit B.

22. IPP International UG downloaded from Defendant one or more bits of each file hash listed on Exhibit A. IPP International UG further downloaded a full copy of each file hash from the BitTorrent file distribution network and confirmed through independent calculation that the file hash matched what is listed on Exhibit A. IPP International UG then verified that the digital media file correlating to each file hash listed on Exhibit A contained a copy of a movie which is identical (or alternatively, strikingly similar or substantially similar) to the movie associated with that file hash on Exhibit A. At no time did IPP International UG upload Plaintiff's copyrighted content to any other BitTorrent user.

23. IPP International UG connected, over a course of time, with Defendant's IP address for each hash value as listed on Exhibit A. The most recent TCP/IP connection between IPP and the Defendant's IP address for each file hash value listed on Exhibit A is included within the column labeled Hit Date UTC. UTC refers to Universal Time which is utilized for air traffic control as well as for computer forensic purposes.

24. An overview of the Copyrights-in-Suit, including each hit date, date of first

publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

25. Plaintiff's evidence establishes that Defendant is a habitual and persistent BitTorrent user and copyright infringer.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I
Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

(A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

(B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

(C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed work pursuant to 17 U.S.C. § 504 (a) and (c);

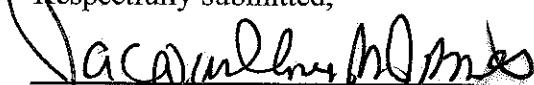
(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

By:

Respectfully submitted,


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Attorneys for Plaintiff

File Hashes for IP Address 69.119.98.182

ISP: Optimum Online**Physical Location:** Warwick, NY

Hit Date UTC	File Hash	Title
10/05/2014 16:41:34	23480B8CA23A12AB7800562AB1E1EA857F083C2B	Shes A Spinner
10/05/2014 16:27:42	77A62B888DCA7688698A083126F88AF113A264B4	Kacey Jordan Does Xart
10/05/2014 16:27:23	62A046C5CD15D4800877BB24409DE3131A68A6A6	Hot Bath For Two
10/05/2014 16:25:57	6302B18246EBDCDD7F7CBE8611A7C98039EDEEBC	Cat Fight
10/05/2014 16:21:25	32FC59A15B8A0E00D0B3F4433568EE5D7E1FDA72	Sparks
09/30/2014 10:49:44	D91FB4466FA9D3AA2A98F2DAFEA9AE2502D48E27	Our Little Cum Cottage
09/30/2014 10:49:31	03A225ECF90F74175A1D1B3ADD5431A199FF730E	Sexy and Wild
09/02/2014 21:40:42	BE684BCE129BDE8827B65645291D7B93F04675F2	Tiffanys Tight Ass
09/02/2014 17:49:21	AF5650A325FF66FDA4A39BE712A4079C11D41755	Elevated Erotica
08/28/2014 19:35:52	E57ED74659C45C36B915F7ED7F06AC247A2BD83A	Sexy En Noir
07/27/2014 14:19:28	F2A404014B130A149740F511D8DBE6F8A66237DC	Highrise Rendezvous
07/08/2014 22:47:39	3306FF999D206ACD958228092CE371BB4FAACDF2	Sexy In The City
07/08/2014 22:46:04	A7655F94C8A103E73DC6552897CCF623A3E88D7D	Lovers Way
06/09/2014 17:08:21	74ED9F16B2D9999FDEC8D0B51D4DC357BF96B745	Sex With Glasses
05/29/2014 16:56:49	A5850C3A6470BB08C05CF823750ECF3A817686EA	Two By Two
05/29/2014 16:33:22	6DFFF2B8FC786651B6F52A241FD296068616F57F	Just Watch Part 2
05/27/2014 13:28:56	E2FB0812F2C1BDC78DB48CA92059EFEC12D8043D	Epic Love
05/17/2014 16:57:12	AE64E35AE7E75AE973222BA3BFE1C4F7388FD915	Perfect Timing
05/17/2014 16:55:40	4842644E88162527E5D4D8B101BCE619983190F4	Raw Passion
04/26/2014 11:53:50	3E1D8C8C67F3C45319A153F68065650466A3EF3F	Tantric Massage
04/22/2014 11:35:04	060634C1E455CDDC5C2CAF4BFEB3CDE147B18472	Going Strong
04/22/2014 11:05:31	80A3176D85D32C18D0A990E2AA11CDCF68AA625D	Catching Up

EXHIBIT A

SNY52

Hit Date UTC	File Hash	Title
04/22/2014 11:05:29	AD3FD17352C81E9935A9D26910DC3C29CF44324F	Made for Each Other
04/21/2014 22:00:44	E12E1C91E8E64F6521394E742BDC51189B9D1671	Rendezvous
04/21/2014 21:08:40	F2F5A22A9C90FFD10E6E08D5690E9EAB531F0C8E	Apartment in Madrid
04/21/2014 21:08:09	40D6652804A7559C52E05B055EAABE34C418AC5A	Not Alone
04/07/2014 08:30:57	7F54C1C11CCF377FC2CD5059E935A0AEA68B4D4C	My Days in Rome
04/03/2014 14:03:38	CB58BA4C0DDD8C4D0AC4499B6518214046A38E6D	Sex and Submission
04/03/2014 13:54:24	5BB2BAF9CF83926F141E1B1799A148B12DD0835C	All Oiled Up
04/02/2014 11:16:40	15A157B489E6762547FBEF9A280676E78B53146A	Deep Blue Passion
03/19/2014 07:07:49	0C14A8E784BDD71479950FD8F7595933530321CE	Trophy Wife
03/16/2014 17:20:00	5BFE0261FD5315EBD491ABBEF7279DE9EE30E377	Side by Side
03/13/2014 14:06:41	7F36C3FAC2AB2921048BFBD68A1905C72BF9337F	Sweet Dreamers
03/13/2014 14:05:26	568DFC435ACFEA9BB0C6A1E7435D97D073731A63	Remembering Strawberry Wine
03/06/2014 15:17:00	5EF8DB86512136FAFC0117E6DAA09CC08ADE0564	Feeling Frisky
03/06/2014 15:16:55	E301EB59D79C12D8F9B07321893678DBD8992191	I Am In the Mood
03/06/2014 15:14:05	3807834CB5E4002AE1227799AD36BAAFB9E36EF1	At Home With Tiffany
02/07/2014 22:01:32	F7465EBED499A1C92C85688D473EAF64B6362FBA	A Hot Number
02/07/2014 22:01:01	56B890DBF45818C57D350DFCE7A9F33615B24F6E	My Naughty Girl
02/07/2014 21:04:26	18DC1288637E25D7B7C9976734A7CA9C79C6C7C9	Get Wild at Home
01/29/2014 12:43:13	85A065477B91C6CACF77B5220F2F08226738649D	Getting Ready For You
01/29/2014 12:34:35	055BC367B3818DA6F20A3CCC86BCD8B4ECCF21A5	So Young
01/15/2014 11:24:12	E5E2D460CE30899508B5E25205738A8A8A6666E7	Zeppelin on Fire
01/15/2014 11:03:24	4CFE9C1C7ECEC949733CA1933E459035A76FA452	In for the Night
12/23/2013 21:41:36	16F3D6B5B404A99467764C59D4B3D2B4B29E3E42	Fantasy Come True
12/23/2013 21:41:16	CC6F5586961EF5CE46145CB6E122E239185E1D67	Model Couple on Vacation
12/15/2013 14:21:27	1A0A908666866B03D53DB9B2766DC199C09EF070	Love at First Sight

EXHIBIT A

Hit Date UTC	File Hash	Title
12/15/2013 13:59:39	B891ADD08C5A6A4F4CD03BE0272B3DB748EBB9A9	Lying Around
12/15/2013 13:56:55	8BE7F47BDA2A11DOA13B9CE5844C2FCF1708042D	LA Plans
12/11/2013 09:44:37	59AB819DE1378BC6DDB715B92ECCF08C0EF6597C	High School Dropouts
12/11/2013 09:42:44	1AE2C5738D6957E318E36D366B8E2D7418ABD822	Ready for Love
12/11/2013 09:42:12	14B5574C0E73CDCCDE75D43CA9E6029A6694F8A8	So Right Its Wrong
12/08/2013 20:40:55	CDDEE4024AA2882BF61FC875A18895BF8475F62F	Tease and Please
11/09/2013 17:11:56	64ADCF0150EAD63FC61B661ADEDEDFO6E5752A1C	Bohemian Rhapsody
10/06/2013 12:01:18	5028025E8FAC072D768663F9C6CEE547212D554C	Date Night at Home
10/06/2013 11:52:46	3ECF7CFC433F37249909B62B8A61240D922D96C0	In Charge
10/06/2013 11:32:24	761074FA959C9C647FBE226AD4E10465AF924F79	We Love Ourselves
09/21/2013 16:29:13	E3042D1EA1F66C3638EA32FF5FE2AA5404D44FE3	A Perfect Match
09/21/2013 16:27:54	8E8F2B5701FDFD5BED87DA48A4137756BCB6DBD4	Come Inside From the Cold
09/09/2013 14:16:05	BE8A9D2C833E811C5EC6ECFE6DE8E2BD4B314046	Malibu Moments
08/24/2013 14:59:48	9C9C57F51775F6799359E29218E595C1A378E3CA	This Really Happened
08/24/2013 14:51:13	BA510602415CA2D79968F175C3C6114450B0F365	Malibu Moments Part #2
08/22/2013 15:33:51	2A936E5B37749915EEDA067A54C93CF84842BEA2	New Romance
08/22/2013 07:02:10	C7F4FD8BDB9089F077C475001B85D0685398EE20	I Love James Deen
08/07/2013 15:29:11	BA9D1342A832D2B3EF523B585F4E908EA7902F3B	Make Me Feel Beautiful
07/19/2013 14:25:58	24611441049DF8ADF2F98C75A6D9BEFD26E701FF	Oh Mia
07/19/2013 14:06:38	EB0DADD7A5B28D90F2B5CC707489A907C607465	Without Words
07/19/2013 13:47:28	693B14A2C359AC8BEF6375B2338A6B9962DDEB7A	Hot Chocolate
07/19/2013 13:01:09	A4230DBD30B3AE972A6E555AE08040859FD94857	Meet Me in Madrid
07/19/2013 12:46:14	125473A2F0962E1613A37C90BBC10F38911938E	Bad Girls
07/05/2013 15:27:34	A38BE961C76C77A590730EA067B4767940B0ABE7	Play Me
07/05/2013 15:20:24	541D7A68C2D86B2F9B9BCFFD18EBFBAE30E15C36	Good Morning Baby

EXHIBIT A

Hit Date UTC	File Hash	Title
06/29/2013 15:27:04	794721F9813E280C0205E1C9EA1599A8C02684F5	Marry Me
05/19/2013 14:20:16	A24B6ABDC5430A0D426B24E7D4BF1CF121F2D517	Names
05/19/2013 14:20:13	C51ECE93C9772D46F5CD94D903BC54303420487A	The Young and the Restless
05/19/2013 14:18:14	7A1C35F909C19B6CA5D36120E2C2199238121802	Simply Stunning
04/26/2013 15:24:31	CA28C0287F7AAED4BFAD9DF43EDE78AF23FA3224	Fashion Models
04/26/2013 14:58:57	A9A2FBE8D2C5989392FC683A6572386FE41E0A58	Carmen Leila Christmas Vacation
04/26/2013 14:55:39	2AE29A600628FBCB8E983388EF0FC470D0B40D7D	Bottoms Up
04/13/2013 13:20:00	208268E705D3EE3BC314A67CCA68FD2CD3C6FFC1	Apartment Number Four

Total Statutory Claims Against Defendant: 80

Copyrights-In-Suit for IP Address 69.119.98.182

ISP: Optimum Online
Location: Warwick, NY

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Shes A Spinner	PA0001914521	09/03/2014	09/17/2014	10/05/2014
Kacey Jordan Does Xart	PA0001916065	10/04/2014	10/06/2014	10/05/2014
Hot Bath For Two	PA0001914734	09/20/2014	09/22/2014	10/05/2014
Cat Fight	PA0001916043	09/26/2014	10/06/2014	10/05/2014
Sparks	PA0001916039	09/24/2014	10/06/2014	10/05/2014
Our Little Cum Cottage	PA0001914537	09/05/2014	09/17/2014	09/30/2014
Sexy and Wild	PA0001914530	09/15/2014	09/16/2014	09/30/2014
Tiffanys Tight Ass	PA0001912772	08/30/2014	09/17/2014	09/02/2014
Elevated Erotica	PA0001909513	08/17/2014	08/26/2014	09/02/2014
Sexy En Noir	PA0001909783	08/22/2014	08/26/2014	08/28/2014
Highrise Rendezvous	PA0001908213	07/25/2014	07/31/2014	07/27/2014
Sexy In The City	PA0001905511	06/27/2014	07/02/2014	07/08/2014
Lovers Way	PA0001905141	06/21/2014	07/02/2014	07/08/2014
Sex With Glasses	PA0001903914	06/05/2014	06/12/2014	06/09/2014
Two By Two	PA0001898093	05/23/2014	06/06/2014	05/29/2014
Just Watch Part 2	PA0001902964	05/27/2014	06/06/2014	05/29/2014
Epic Love	PA0001898091	05/25/2014	06/06/2014	05/27/2014
Perfect Timing	PA0001895848	05/07/2014	05/16/2014	05/17/2014
Raw Passion	PA0001860979	08/18/2013	09/02/2013	05/17/2014
Tantric Massage	PA0001892180	04/25/2014	04/29/2014	04/26/2014
Going Strong	PA0001859660	07/06/2013	08/02/2013	04/22/2014

EXHIBIT B

SNY52

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Catching Up	PA0001889391	04/13/2014	04/15/2014	04/22/2014
Made for Each Other	PA0001860974	07/31/2013	08/29/2013	04/22/2014
Rendezvous	PA0001889397	04/12/2014	04/15/2014	04/21/2014
Apartment in Madrid	PA0001826992	02/16/2013	02/18/2013	04/21/2014
Not Alone	PA0001889410	04/09/2014	04/15/2014	04/21/2014
My Days in Rome	PA0001886187	03/28/2014	04/02/2014	04/07/2014
Sex and Submission	PA0001882649	03/01/2014	03/06/2014	04/03/2014
All Oiled Up	PA0001885187	03/15/2014	03/24/2014	04/03/2014
Deep Blue Passion	PA0001885168	03/21/2014	03/24/2014	04/02/2014
Trophy Wife	PA0001883767	03/05/2014	03/22/2014	03/19/2014
Side by Side	PA0001805261	09/03/2012	09/19/2012	03/16/2014
Sweet Dreamers	PA0001883771	03/09/2014	03/24/2014	03/13/2014
Remembering Strawberry Wine	PA0001885184	03/11/2014	03/24/2014	03/13/2014
Feeling Frisky	PA0001880671	02/22/2014	02/27/2014	03/06/2014
I Am In the Mood	PA0001880672	02/25/2014	02/27/2014	03/06/2014
At Home With Tiffany	PA0001880496	02/17/2014	02/21/2014	03/06/2014
A Hot Number	PA0001878456	01/30/2014	02/18/2014	02/07/2014
My Naughty Girl	PA0001868094	10/28/2013	11/01/2013	02/07/2014
Get Wild at Home	PA0001877470	01/22/2014	01/31/2014	02/07/2014
Getting Ready For You	PA0001874744	01/10/2014	01/15/2014	01/29/2014
So Young	PA0001877472	01/25/2014	01/31/2014	01/29/2014
Zeppelin on Fire	PA0001874614	01/04/2014	01/05/2014	01/15/2014
In for the Night	PA0001874670	01/06/2014	01/06/2014	01/15/2014
Fantasy Come True	PA0001874629	12/19/2013	12/26/2013	12/23/2013
Model Couple on Vacation	PA0001874613	12/17/2013	12/26/2013	12/23/2013

EXHIBIT B

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Love at First Sight	PA0001872756	12/14/2013	12/15/2013	12/15/2013
Lying Around	PA0001872754	12/10/2013	12/15/2013	12/15/2013
LA Plans	PA0001869248	11/19/2013	11/22/2013	12/15/2013
High School Dropouts	PA0001871934	11/21/2013	11/29/2013	12/11/2013
Ready for Love	PA0001872968	12/05/2013	12/07/2013	12/11/2013
So Right Its Wrong	PA0001872084	12/01/2013	12/04/2013	12/11/2013
Tease and Please	PA0001871937	11/23/2013	11/29/2013	12/08/2013
Bohemian Rhapsody	PA0001867584	10/23/2013	10/25/2013	11/09/2013
Date Night at Home	PA0001864689	09/29/2013	09/30/2013	10/06/2013
In Charge	PA0001865956	10/04/2013	10/06/2013	10/06/2013
We Love Ourselves	PA0001860944	08/26/2013	09/08/2013	10/06/2013
A Perfect Match	PA0001862419	09/11/2013	09/12/2013	09/21/2013
Come Inside From the Cold	PA0001862484	09/12/2013	09/18/2013	09/21/2013
Malibu Moments	PA0001862283	09/03/2013	09/08/2013	09/09/2013
This Really Happened	PA0001860970	08/03/2013	09/01/2013	08/24/2013
Malibu Moments Part #2	PA0001860958	08/15/2013	09/02/2013	08/24/2013
New Romance	PA0001860972	08/05/2013	09/03/2013	08/22/2013
I Love James Deen	PA0001860982	08/20/2013	09/10/2013	08/22/2013
Make Me Feel Beautiful	PA0001859651	07/25/2013	08/01/2013	08/07/2013
Oh Mia	PA0001852674	06/28/2013	07/05/2013	07/19/2013
Without Words	PA0001859650	07/17/2013	08/01/2013	07/19/2013
Hot Chocolate	PA0001859657	07/11/2013	08/02/2013	07/19/2013
Meet Me in Madrid	PA0001847658	06/12/2013	06/30/2013	07/19/2013
Bad Girls	PA0001847661	06/07/2013	06/17/2013	07/19/2013
Play Me	PA0001847659	06/14/2013	06/30/2013	07/05/2013

EXHIBIT B

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
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The Young and the Restless	PA0001843111	05/05/2013	05/15/2013	05/19/2013
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Fashion Models	PA0001838599	04/19/2013	04/28/2013	04/26/2013
Carmen Leila Christmas Vacation	PA0001771706	12/16/2011	01/17/2012	04/26/2013
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